

EXHIBIT H

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 IN RE: NATIONAL PRESCRIPTION) No. 17-md-2804
5 OPIATE LITIGATION)
6)
7 APPLIES TO ALL CASES) Hon. Dan A. Polster
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VIDEO DEPOSITION OF CATHERINE RAHILLY-TIERNEY, M.D.

June 7, 2019
9:10 a.m.

*HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
CONFIDENTIAL REVIEW*

Reporter: Jude Arndt, CSR, RPR
CSR No. 084-004847

1 Q. Okay. Harvard Medical School doesn't pay
2 you for that --

3 A. No.

4 Q. -- right?

5 A. (Shaking head "no.")

6 Q. Are you employed in any form or fashion by
7 Harvard Medical School?

8 MR. METZ: Objection to form.

9 A. No.

10 BY MR. KIEFFER:

11 Q. I looked on the website of Harvard Medical
12 School at its faculty, and I did not see your name
13 anywhere. Does that -- probably doesn't surprise you;
14 right?

15 A. Correct.

16 Q. And that's because you're not -- you are
17 not affiliated with Harvard in the sense of being its
18 employee or its teaching faculty; true?

19 MR. METZ: Objection to form.

20 A. So I hold a title as an instructor in
21 medicine at Harvard Medical School. That makes me part
22 of their teaching faculty.

23 BY MR. KIEFFER:

24 Q. Okay. That is -- it's not a tenure track

1 correct?

2 A. Correct.

3 Q. And some of the companion concepts such as
4 substance abuse disorder, opioid use disorder -- none
5 of that research or publication through the VA focused
6 on those issues; true?

7 A. That's correct.

8 Q. Okay. I asked you earlier about your work
9 as -- your work supervising residents at the VA and
10 some of the topics that you would make presentations
11 on, for example the topics where you've created
12 PowerPoints. And I know you told us you had never done
13 any formal presentations to those students or residents
14 on the topic of opioids; correct?

15 A. That is correct.

16 Q. I want to expand on that now and ask, is
17 it true that you have never presented formal
18 instruction, whether in a classroom or at a podium, or
19 via PowerPoint, on the topic of opioid medications?

20 MR. METZ: Objection to form.

21 BY MR. KIEFFER:

22 Q. Formal instruction. Lecture,
23 presentations, that sort of stuff.

24 A. That is correct.

1 A. I believe so.

2 Q. Okay.

3 A. I don't know why someone would do that,
4 but yes.

5 Q. If you turn to Page 62. I'm going to
6 momentarily skip over the report of current research
7 activities. I am going to come back to that, but let
8 me ask you this.

9 On your report of scholarship underneath
10 that that runs several pages, it looks to me -- and we
11 don't have to count them up right now, but I did count
12 them earlier. It looks to me like there are about 19
13 publications that you're an author or a co-author on.

14 None of those had as their focus opioid
15 medications; correct?

16 A. That's correct.

17 Q. Or related topics like opioid use
18 disorders, substance abuse -- or use disorder,
19 polysubstance abuse disorder, any of those things?

20 MR. METZ: Objection to form.

21 A. Not directly, no.

22 BY MR. KIEFFER:

23 Q. Okay. Is it true that you have never
24 published in a peer-reviewed journal or otherwise any